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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

DAVE VACCARO, individually, and
on behalf of other members of the
general public similarly situated,

Plaintiff,

vs.

ALTAIS, INC.; BROWN &
TOLAND PHYSICIAN SERVICES
ORGANIZATION, LLC, GRAIN
CONSULTING, CORP, and DOES
through 10, inclusive, and each of
them

Defendants.

Case No. 2:23-CV-04513-KK-BFM

**NOTICE OF SETTLEMENT AND
JOINT STIPULATION TO STAY
CURRENT DEADLINES**

NOW COMES the Plaintiff, DAVE VACCARO, and the Defendants, ALTAIS, INC., BROWN & TOLAND PHYSICIAN SERVICES ORGANIZATION, LLC, and GRAIN CONSULTING CORP by and through their respective counsel of record, to advise the Court that the Parties have reached an agreement on principal terms to settle the above-captioned case.

Accordingly, the Parties hereby request that the Court stay all deadlines in this Action. The purpose of the stay is to avoid any additional expense, and further the

1 interests of judicial economy, while the Parties focus their efforts on formalizing and
2 finalizing a complete settlement agreement. The Parties anticipate a notice of
3 dismissal being filed within 60 days.

4 The Parties therefore respectfully request that the Court vacate all currently
5 set dates, with the expectation that a Notice or Stipulation of Dismissal, or Joint
6 Status Report, will be filed within sixty (60) days

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1 SO STIPULATED:

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3 Dated: December 5, 2023

Respectfully submitted,

4 LAW OFFICES OF TODD M. FRIEDMAN, P.C.

5 By: /s/ Todd M. Friedman

6 TODD M. FRIEDMAN, ESQ.

7 Attorney for Plaintiff

8 Dated: December 5, 2023

Respectfully submitted,

9 KESSENICK GAMMA LLP

10 By: /s/ James M. Cooper

11 JAMES M. COOPER, ESQ.

12 Attorney for ALTAIS INC. and BROWN

13 & TOLAND PHYSICIAN SERVICES

14 ORGANIZATION, LLC

15 Dated: December 5, 2023

Respectfully submitted,

16 CALDARELLI HEJMANOWSKI PAGE &
17 LEER LLP

18 By: /s/ Lee E. Hejmanowski

19 LEE E. HEJMANOWSKI, ESQ.

20 Attorney for GRAIN COUNSULTING
21 CORP.

LOCAL RULE 5-4.3.4(a)(2)(i) CERTIFICATION

The filer of this document attests that all other signatories listed above on whose behalf this filing is submitted concur in the filing's content and have authorized the filing.

Respectfully submitted,

LAW OFFICES OF TODD M. FRIEDMAN, P.C.

By: /s/ Todd M. Friedman
Todd M. Friedman, Esq.
Attorney for Plaintiff

PROOF OF SERVICE

I, the undersigned, certify and declare that I am over the age of 18 years, employed in the County of Los Angeles, State of California, and not a party to the above-entitled cause. On December 5, 2023, I served a true copy of the Notice of Settlement and Stipulation to Stay Current Deadlines on all counsel of record via the ECF Filing System:

Executed on December 5, 2023.

☒ I hereby certify that I am a member of the Bar of the United States District Court, Central District of California.

☐ I hereby certify that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

☒ I hereby certify under the penalty of perjury that the foregoing is true and correct.

By: /s/ Todd M. Friedman
Todd M. Friedman, Esq.
Attorney for Plaintiffs